

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

FEDERAL HOME LOAN MORTGAGE
CORPORATION,

Plaintiff,

v.

WILLIAM E. KANTZ, JR.,

Defendant.

WILLIAM E. KANTZ, JR.,

Third-Party Plaintiff,

v.

BANK OF AMERICA, N.A.,
RUBIN LUBLIN TN, PLLC,

Third-Party Defendants.

FLEX YIELD INVESTMENTS, LLC,

Intervenor,

v.

FEDERAL HOUSING FINANCING
AGENCY, on its own behalf and as
conservator of FEDERAL HOME LOAN
MORTGAGE CORPORATION,

Intervenor-Defendant and
Real Party in Interest,

and

RUBIN LUBLIN TN, PLLC.

Intervenor-Defendant.

Case No. 3:15-cv-00932

Judge Campbell
Magistrate Judge Bryant

MOTION FOR EXTENSION OF TIME TO FILE RESPONSE

Intervenor Flex Yield Investments, LLC (“FYI”), by and through its undersigned counsel, hereby respectfully moves this Honorable Court, pursuant to Federal Rule of Civil Procedure 6(b), for an extension of time to respond to Federal Housing Financing Agency’s (“FHFA”)¹ Motion to Strike or, in the Alternative, to Dismiss (DE 95, “Motion”) FYI’s Amended Complaint in Intervention (DE 45), as follows:

On February 4, 2016, FYI’s attorney of record, the undersigned, was involved in an automobile accident. Since the accident the undersigned has been recuperating and, when able to do so, has travelled out-of-state for several days with his daughter to visit a college she may be attending next fall following her high school graduation this coming spring. Consequently, the undersigned’s workload has backlogged a bit but he has been, for the most part, diligently and timely addressing the situation. FYI’s counsel does not have other attorneys in his office to research or prepare the response due with respect to FHFA’s Motion. FYI’s response to FHFA’s Motion (which Motion is accompanied by a Memorandum of Law and attachments totaling 131 pages) is currently due to be filed on Monday, **February 29, 2016**. FYI has not previously requested an extension of time as to FHFA’s Motion.

WHEREFORE, FYI respectfully requests an extension of time, up to and including Tuesday, **March 15, 2016**, by which to file its response to FHFA’s Motion.

Respectfully submitted,

By: s/ Scott D. Johannessen

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*Attorney for Intervenor,
Flex Yield Investments, LLC*

¹ FHFA is joined and named as a party in this case on its own behalf and as Conservator of Federal Home Loan Mortgage Corporation (“Freddie Mac”).

CERTIFICATE OF SERVICE

Pursuant to Local Rule 5.01, the undersigned hereby certifies that a true and correct copy of the foregoing document, entitled *Motion for Extension of Time to File Response*, was delivered to the following persons/entities appearing of record herein via electronic mail through the Court's ECF system and, if not appearing of record herein, via regular United States first class mail, postage prepaid:

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Executed on February 29, 2016.

By: s/ Scott D. Johannessen
Scott D. Johannessen